

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:05-CR-223
)	The Honorable T.S. Ellis, III
)	(Sentencing October 27, 2005)
EMMANUEL OSHO,)	
)	
Defendant.)	
)	
)	

SUPPLEMENTAL STATEMENT OF FACTS

Were this case to go to trial, the government would prove beyond a reasonable doubt by competent and admissible evidence the following:

1. The defendant, EMMANUEL OSHO, stole from the U.S. mail routed through Dulles International Airport envelopes that contained credit cards and that were addressed to and intended for delivery to more than 250 individuals.
2. “Strikers” and other co-schemers used the credit cards stolen by OSHO, to make cash advance withdrawals and purchases totaling between \$2,500,001.00 and \$7,000,000.00.
3. OSHO’s actions as described above were undertaken knowingly, willfully and unlawfully and did not result from accident, mistake or other innocent reason.
4. The scheme described in the statement of facts filed on July 20, 2005, and this supplemental statement of facts resulted in an actual and intended loss of between \$2,500,001.00 but less than \$7,000,000.00.

5. The scheme described in the statement of facts filed on July 20, 2005, and this supplemental statement of facts involved more than 250 victims.

Respectfully submitted,

Paul J. McNulty
United States Attorney

By: _____
Stephanie Bibighaus Hammerstrom
Assistant United States Attorney

Seen and Agreed:

Emmanuel Osho
Defendant

Bruce Johnson, Jr.
Counsel for Defendant